1 Paul J. Cambria, Jr. (CA 177957) pcambria@lglaw.com 2 LIPSITZ GREEN SCIME CAMBRIA LLP 3 42 Delaware Avenue, Suite 120 Buffalo, New York 14202 4 Telephone: (716) 849-1333 Facsimile: (716) 855-1580 5 6 Attorneys for Michael Lacey 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA 10 In the Matter of the Seizure of: Case No. 2:18-cv-06742-RGK-PJW 11 12 Any and all funds held in Republic **CLAIMANT MICHAEL LACEY'S** Bank of Arizona Account(s) xxxx1889, 13 JOINDER IN JAMES LARKIN'S MOTION xxxx2592, xxxx1938, xxxx2912, and, TO ACCESS AND USE PURPORTEDLY xxxx2500. 14 **INADVERTENTLY PRODUCED** 15 **MATERIALS** 16 Date: October 29, 2018 17 Time: 9:00 a.m. **Crtrm: 850** 18 19 Assigned to Hon. R. Gary. Klausner 20 21 22 23 24 25 26 27 28 3382728_1

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TO THE COURT AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT Claimant Michael Lacey, by and through his counsel, will and hereby does join in James Larkin's Motion to Access and Use Purportedly Inadvertently Produced Materials (the "Motion") (Doc. 69), and adopts all of the positions set forth in the Motion as if fully set forth herein. Mr. Lacey joins in the Motion because he is "so similarly situated [to Mr. Larkin] that filing an independent motion would be redundant." Tatung Co., Ltd. v. Shu Tze Hsu, 217 F. Supp. 3d 1138, 1151 (C.D. Cal. 2016). Consequently, all of the arguments made in the Motion apply with equal force to Mr. Lacey.

DATED: October 1, 2018

Respectfully submitted,

Paul J. Cambria, Jr.

Lipsitz Green Scime Cambria LLP

By: /s/ Paul J. Cambria, Jr.

Paul J. Cambria, Jr.

Attorneys for Michael Lacey

CERTIFICATE OF SERVICE I hereby certify that on October 1, 2018, I filed the foregoing with the United States District Court for the Central District of California using the CM/ECF system. I hereby certify that on October 1, 2018, a copy of the foregoing was also delivered to the following via CM/ECF: JOHN K. KUCERA, ESQ. Assistant U.S. Attorney U.S. Attorney's Office **Asset Forfeiture Section** 312 North Spring Street Los Angeles, CA 90012 Dated: Buffalo, New York October 1, 2018 /s/April L. Kelly April L. Kelly